

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 19

SSA MARINE, INC. and SSA TERMINALS LLC
(Petitioner)

Case No. 19-CD-502

and

INTERNATIONAL ASSOCIATION OF MACHINISTS,
DISTRICT LODGE 160, LOCAL LODGE 289

(Union)

STIPULATION AND REQUEST FOR AN EXTENSION OF TIME TO FILE POST
HEARING BRIEFS

Comes now SSA Marine, Inc. (SSA Marine), through its related company, SSA Pacific, the International Association of Machinists and Aerospace Workers District Lodge 160, Local Lodge 289 (IAM), and the International Longshore and Warehouse Union, Local 19 (ILWU), by and through their respective counsel, hereby submit this request pursuant to 102.90 of the Board's Rules and Regulations, for an extension of time to submit Post Hearing Briefs to the Board in the above-referenced 10(k) matter and in support thereof states as follows:

1. The parties request an extension of time to file brief's such that each party's supporting brief is due to be filed in this matter by July 24, 2009.
2. The parties stipulate that in light of the complex and lengthy bargaining history of the parties to the dispute as reflected in the parties' previous stipulation and the Hearing Officer's Report that an extension of time is necessary to adequately brief the issues.
3. Counsel for the respective parties also stipulate that they each have extensive work loads and prior commitments which impacts on its ability to file briefs

within the 7 day limit following the close of the 10(k) Hearing specified under Section 102.90.

4. The parties stipulate that none of them oppose the Board's granting the parties an extension of time to file Post Hearing Briefs.

WHEREFORE, the parties respectfully request that the time period in which to file a Post Hearing Brief be extended to a due date of July 24, 2009.

IT IS SO STIPULATED.

Dated: July 2, 2009

GORDON & REES LLP

By: /s/
James J. McMullen, Jr.
Attorneys SSA Marine, Inc.

Dated: July 2, 2009

ROBBLEE BRENNAN & DETWILER

By: /s/
Terry Jensen
Attorneys for International Association of
Machinists & Aerospace Workers

Dated: July 2, 2009

LEONARD, CARDER LLP

By: /s/
Rob Remar, Esq.
Attorneys for International Longshore &
Warehouse Union

IT IS SO ORDERED.

DATED: _____
